

**BROADVOICE**  
**Legal Department**

William J. Rooney, Jr.  
89 Access Road  
Suite B  
Norwood, MA 02062  
Tel: (781) 551-9707  
Fax: (781) 551-9984  
wrooney@gnaps.com

November 28, 2005

Marlene H. Dortch,  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW,  
Washington, DC 20554.

Re: **WC Docket No. 05-196 Subscriber Compliance Letter for BroadVoice, Inc.**

Dear Ms. Dortch:

Please accept the following as the "Subscriber Compliance Letter" of BroadVoice Inc. ("BV") in the above referenced docket. Due to its preeminence in furnishing such services, BV has engaged Intrado, Inc. ("Intrado") to provide 911 service for its customers in compliance with the rules established in the *VoIP 911 Order*.

By and through this Letter, BroadVoice requests the ability to continue to provide its expanding customer base with VoIP services. As shall be demonstrated below, BroadVoice has, by and through its affiliation with Intrado, sought to implement a complete solution to its customers. However, as with anything, there is not yet perfect 100% compliance. We look forward to when this complete situation is attained.

The following is based upon Intrado's report to BV.

**911 Solution:**

***Public Notice Requires.*** This description should include quantification, on a percentage basis, of the number of subscribers to whom the provider is able to provide 911 service in compliance with the rules established in the *VoIP 911 Order*. Further, the detailed description of the technical solution should include the following components:

The V9-1-1™ solution enabled by Intrado provides a true E9-1-1 solution for VoIP Service Providers. Intrado enables a comprehensive approach to delivering E9-1-1 for VoIP by handling all aspects of the VoIP 9-1-1 call delivery and VoIP Positioning Center (VPC) functionality such as Master Street Address Guide (MSAG) Address Validation, ESQK management, Geocoding, real-time provisioning and routing determination. Included in the Service for the VSP is also the call delivery component to ensure the 9-1-1 call reaches the appropriate selective router and Public Safety Answering Point (PSAP). Intrado manages the VPC functionality and the Call delivery component on behalf of the VSP thereby enabling a full end to end solution from one service provider.

The only VSP customer requirements for delivery of the V9-1-1 service are the ongoing delivery of address and telephone number information to Intrado via a real-time interface and the connectivity to the Intrado network to enable live 9-1-1 call delivery.

○ 911 Routing Information/Connectivity to Wireline E911 Network:

**Public Notice Requires:** A detailed statement as to whether the provider is transmitting, as specified in Paragraph 42 of the *VoIP 911 Order*, "all 911 calls to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority utilizing the Selective Router, the trunk line(s) between the Selective Router and the PSAP, and such other elements of the Wireline E911 Network as are necessary in those areas where Selective Routers are utilized."<sup>1</sup> If the provider is not transmitting all 911 calls to the correct answering point in areas where Selective Routers are utilized, this statement should include a detailed explanation why not. In addition, the provider should quantify the number of Selective Routers to which it has interconnected, directly or indirectly, as of November 28, 2005.

Currently through the assistance of Intrado's Network providers, BV has access to 154 E9-1-1 Selective Routers. The attached Major Market Deployment Map and the VoIP Deployment Plan reflects the major market deployment schedules. (Note: the market deployment map represent major markets where Intrado has connectivity to at least 1 selective router, ALI steering and the ability to populate ALI.)

○ Transmission of ANI and Registered Location Information:

**Public Notice Requires:** A detailed statement as to whether the provider is transmitting via the Wireline E911 Network the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information. This information should include: (i) a quantification, on a percentage basis, of how many answering points within the provider's service area are capable of receiving and processing ANI and Registered Location information that the provider transmits; (ii) a quantification of the number of subscribers, on a percentage basis, whose ANI and Registered Location are being transmitted to answering points that are capable of receiving and processing this information; and (iii) if the provider is not transmitting the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information, a detailed explanation why not.

- **Basic PSAP:** Currently 93% of the US population is served by PSAPs operating off an E9-1-1 Selective Router. To illustrate PSAPs within the US, which are not served by a Selective Router, the enclosed "Basic PSAP" map could be used as reference information. **While these areas are not included within the FCC Order and are not required for compliance**, Intrado is actively contacting these areas to determine technical options for VoIP E9-1-1 native call delivery. **Reporting this information is not required by the FCC.**
- **ANI Only:** There are unique deployment circumstances in areas of the US and Puerto Rico that operate off E9-1-1 Selective Routers, but will not meet the full FCC mandate. This information should be considered as part of the compliance report to the Commission. Intrado is currently aware of four (4) States and a Territory within your serving area that will have native Selective Routing functionality but will only provide Automatic Number Identification (ANI) only service to the PSAP. The following information explains the circumstances within these areas:

---

<sup>1</sup> *VoIP 911 Order*, 20 FCC Rcd at 10269-70, ¶ 42 (footnote omitted).

**New Jersey** - In the State of New Jersey Intrado has gained permission from the State to deploy a voice only service which includes the call taker receiving ANI on the VoIP 911 caller. The State ALI system is not capable of full dynamic ALI updates and will require an upgrade. New Jersey represents 3% of the total US population.

**Ohio** - To date, Ohio has not granted permission to Intrado to deploy a voice only solution. The State ALI system is not capable of full dynamic ALI update. Ohio represents 4% of the total US population.

**Hawaii** - To date, Hawaii has not granted permission to Intrado to deploy a voice only solution. The ALI systems are not capable of full dynamic ALI update. Hawaii represents 5% of the total US population.<sup>2</sup>

**Puerto Rico** - To date, Puerto Rico has not granted permission to Intrado to deploy a voice only solution. The ALI systems are not capable of full dynamic ALI update. Puerto Rico represents 3% of the total US population.<sup>3</sup>

- **VSP Specific Metrics:** Please see the attached VSP Specific Metrics
- **911 Coverage:**

**Public Notice Requires:** To the extent a provider has not achieved full 911 compliance with the requirements of the *VoIP 911 Order* in all areas of the country by November 28, 2005, the provider should: 1) describe in detail, either in narrative form or by map, the areas of the country, on a MSA basis, where it is in full compliance and those in which it is not; and 2) describe in detail its plans for coming into full compliance with the requirements of the order, including its anticipated timeframe for such compliance.

- **Deployment Overview** – Intrado, is working on nationwide native VoIP E9-1-1 delivery in accordance with the Commission Order. The initial PSAP deployments are targeted in major metropolitan areas throughout the US based on the VSP customer subscriber base priorities. The attached “Major Market Deployment Map”, which corresponds with MSAs, identifies regions that have connectivity to at least one Selective Router, ALI steering capabilities; ANI and the ability to populate ALI. These areas are planned for deployments by November 28, 2005; March 31, 2006 and June 30, 2006. This map could be used to demonstrate FCC compliance for the November 28<sup>th</sup> requirements and the future deployment strategy.

**Obtaining Initial Registered Location Information:**

---

<sup>2</sup> BroadVoice does not currently serve any users with geographical locations in Hawaii to the best of its knowledge, information and belief.

<sup>3</sup> BroadVoice does not currently serve any users with geographical locations in Puerto Rico to the best of its knowledge, information and belief.

**Public Notice Requires:** A detailed description of all actions the provider has taken to obtain each existing subscriber's current Registered Location and each new subscriber's initial Registered Location. This information should include, but is not limited to, relevant dates and methods of contact with subscribers and a quantification, on a percentage basis, of the number of subscribers from whom the provider has obtained the Registered Location.

As of November 28, 2005, 95.77% of BV customers have acknowledged BV's notice regarding E911 notification. In most instances these same customers have provided location identification via mail or e-mail. Moreover, BV has initiated "first-call verification" for new and existing customers.

As a component of Intrado's V9-1-1 Service, BV has access to the Intrado Validation and Update Interface (VUI) which enables near real time delivery of the BV acquired or BV user-submitted address update information. VSPs may integrate VUI into their existing provisioning systems to ensure seamless delivery of acquired registered location information to the Intrado system.

#### **Obtaining Updated Registered Location Information:**

**Public Notice Requirements:** A detailed description of the method(s) the provider has offered its subscribers to update their Registered Locations. This information should include a statement as to whether the provider is offering its subscribers at least one option for updating their Registered Location that permits them to use the same equipment that they use to access their interconnected VoIP service.

The V9-1-1™ Mobility Services provides Intrado Customers with a real-time provisioning interface to provision/register subscriber (location) data to Intrado to ensure the proper address and call back number is delivered to the appropriate PSAP at the time of a VoIP 9-1-1 call. This interface is named the Validation and Update Interface (VUI). Intrado's real-time provisioning process enabled by VUI includes a geocoding process as well as management of Master Street Address Guide (MSAG) validation at the time of provisioning. Customers can utilize a VSP provided web portal or a VSP provided service center by phone to enable the near real-time update to Intrado.

At the time of the VoIP 9-1-1 call Intrado uses the VSP customer's provisioned information to associate the latitude and longitude assigned during provisioning with the wireline PSAP boundaries maintained by Intrado to determine appropriate PSAP for delivery of the MSAG Valid address and Call Back Number of the user.

Intrado also enables a VSP to utilize the Intrado Level of Service (LoS) query integrated into the VUI application. This functionality enables a real-time query to Intrado with an address of a customer/end user for the purpose of determining the level of E9-1-1 service available to that customer based on their location. Intrado will return a set of responses (Enhanced, Basic, etc.) that will enable the user to determine E9-1-1 service level and take appropriate action.

#### **Technical Solution for Nomadic Subscribers:**

**Public Notice Requirements:** A detailed description of any technical solutions the provider is implementing or has implemented to ensure that subscribers have access to 911 service whenever they use their service nomadically.

VSPs utilizing Intrado's V9-1-1™ Mobility Services are able to route VoIP emergency calls from their VoIP network to the Intrado Network or alternative 3rd party network for delivery to

the appropriate Selective Router and then on to the geographically appropriate Public Safety Answering Point (PSAP) via the native 9-1-1 infrastructure. The Services utilized provide a "native" 9-1-1 solution for routing VoIP 9-1-1 calls from both in-region and out-of-region telephone numbers (TNs) to the most geographically appropriate PSAP. The V9-1-1 solution enables full support of nomadic usage of VoIP provided the user updates their address information upon arrival into a new location. Through the Validation and Update Interface (VUI) the V9-1-1 solution will enable the near real-time provisioning (Geocoding and MSAG Validation) of the newly provisioned address and make available (assuming no errors) that user's information for delivery to the PSAP within 15 minutes of receipt.

Intrado recognizes the need for removing the user interaction and self provisioning component of the solution. To that end, Intrado is actively working and trialing a number of location determination technologies, which will be supported by Intrado and the Intrado provisioning interface.

**Public Notice Requires:** To the extent a provider has not achieved full 911 compliance with the requirements of the *VoIP 911 Order* in all areas of the country by November 28, 2005, the provider should: 1) describe in detail, either in narrative form or by map, the areas of the country, on a MSA basis, where it is in full compliance and those in which it is not; and 2) describe in detail its plans for coming into full compliance with the requirements of the order, including its anticipated timeframe for such compliance.

- **Deployment Overview** – Intrado, on behalf of BV, is working on nationwide native VoIP E9-1-1 delivery in accordance with the Commission Order. The initial PSAP deployments are targeted in major metropolitan areas throughout the US based on the VSP customer subscriber base priorities. The attached "Major Market Deployment Map", which corresponds with MSAs, identifies regions within your territory that have connectivity to at least one Selective Router, ALI steering capabilities; ANI and the ability to populate ALI. These areas are planned for deployments by November 28, 2005; March 31, 2006 and June 30, 2006. This map could be used to demonstrate FCC compliance for the November 28<sup>th</sup> requirements and the future deployment strategy.

Thank you for your attention this matter. We will be happy to respond to further inquiries regarding our continuing compliance with FCC requirements for VoIP E9-1-1.

Sincerely,

William J. Rooney, Jr.

CC: Gene Cornfield